

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

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CLAUDIA L. HART,  
CAROL S. STEINHAUS,  
KARIN M. STULZ, and  
MARGARET E. VROMAN,

Case No. 2:19-cv-00041  
Hon. Paul L. Maloney  
Magistrate Phillip J. Green

Plaintiffs,

vs.

NORTHERN MICHIGAN  
UNIVERSITY, a public entity,

Defendant.

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**FIRST AMENDED COMPLAINT AND JURY DEMAND**

Plaintiffs Claudia L. Hart, Carol S. Steinhaus, Karin M. Stulz, and Margaret E. Vroman, by their attorneys, Sterling Attorneys at Law, P.C., supplement their original Complaint, filed on February 8, 2019, with this First Amended Complaint and Jury Demand, and submit the following:

## COUNT III

### **SEX DISCRIMINATION/RETALIATION IN VIOLATION OF TITLE VII**

47. Plaintiffs incorporate all the preceding paragraphs set forth in their original Complaint.

48. Plaintiffs received their Notice of Right to Sue letters from the U.S. Department of Justice on or about September 23, 2019, regarding their claims of sex discrimination in violation of Title VII of the Civil Rights Act of 1964 (“Title VII”), 42 USC 2000e *et seq.*

49. By stipulated Order dated November 22, 2019, the Court permitted plaintiffs to add their Title VII claims on or before November 29, 2019.

50. Title VII makes it unlawful for an employer to discriminate against employees on the basis of sex.

51. Title VII also makes it unlawful for an employer to retaliate against employees who complain of sex discrimination.

52. At all relevant times, plaintiffs were employees and defendant was their employer covered by and within the meaning of Title VII.

53. Defendant’s treatment of plaintiffs was based, at least in part, on unlawful consideration of their sex.

54. Defendant, by its agents, was predisposed to discriminate on the basis of sex, and acted in accordance with that predisposition.

55. Plaintiffs engaged in activity protected by Title VII when they complained internally of sex discrimination.

56. Plaintiffs engaged in activity protected by Title VII when they filed charges of sex discrimination with the Equal Employment Opportunity Commission.

57. Defendant's treatment of plaintiffs is in violation of the anti-retaliation provisions of Title VII.

58. The actions of defendant by its agents were deliberate and intentional, and engaged in with malice, or with reckless indifference to the rights and sensibilities of plaintiffs.

59. As a direct and proximate result of defendant's wrongful and discriminatory treatment of plaintiffs, plaintiffs have suffered injuries and damages, including but not limited to, loss of past, present and future earnings and earning capacity; loss of the value of fringe and pension benefits; mental and emotional distress, including anxiety and mental anguish, humiliation and embarrassment; and the loss of the ordinary pleasures of everyday life.

WHEREFORE, for the reasons set forth herein and in the original Complaint, plaintiffs respectfully request that this Honorable Court enter judgment against defendant, in whatever amount plaintiffs are found to be entitled, together with punitive damages, equitable relief, interest as an element of damages, statutory interest, and attorney fees and costs.

## JURY DEMAND

Plaintiffs Claudia L. Hart, Carol S. Steinhause, Karin M. Stulz, and Margaret E. Vroman, by their attorneys Sterling Attorneys at Law, P.C., reiterate their demand for a trial by jury.

### PROOF OF SERVICE

I certify that on November 26, 2019, I filed the foregoing paper with the Clerk of the Court using the ECF system which will electronically send notification to all counsel of record.

/s/Brian J. Farrar

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Respectfully submitted,

STERLING ATTORNEYS AT LAW, P.C.

By: /s/Brian J. Farrar

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